

EXHIBIT K

THE HONORABLE THOMAS S. ZILLY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

BUNGIE, INC.,

Plaintiff,

v.

AIMJUNKIES.COM; PHOENIX
DIGITAL GROUP LLC; DAVID
SCHAEFER; JORDAN GREEN;
JEFFREY CONWAY; JAMES MAY,,

Defendants.

No. 2:21-cv-811-TSZ

BUNGIE, INC.'S SUPPLEMENTAL
OBJECTIONS AND RESPONSES TO
DEFENDANT PHOENIX DIGITAL
GROUP LLC'S FIRST SET OF
REQUESTS FOR PRODUCTION

PRELIMINARY STATEMENT

The objections and responses set forth below are based upon such information that is presently available to Bungie. Bungie provides these objections and responses without prejudice to its right to assert additional objections and amend or supplement any or all of the information contained in its responses as additional facts are ascertained, analyses are made, and research is completed. These objections and responses are made without waiving or intending to waive, but on the contrary preserving:

a. all assertions as to competency, relevancy, materiality, privilege, and admissibility as evidence for any purpose of the responses or subject matter thereof, in any proceeding in this action, including trial, or in any other action;

BUNGIE'S SUPP. OBJ. AND RESP. TO
PHOENIX DIGITAL'S FIRST SET OF RFPS – 1
(No. 2:21-cv-811-TSZ)

Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, Washington 98101-3099
Phone: +1.206.359.8000
Fax: +1.206.359.9000

SUPPLEMENTAL RESPONSES

REQUEST FOR PRODUCTION NO. 1:

A true and correct copy of the source code for the “Destiny 2” work identified in Copyright Registration No. TX 8-933-655.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1:

Subject to and without waiving its General Objections, Bungie will produce non-privileged documents responsive to this Request that are in Bungie’s possession, custody, or control, if any, that are located after a reasonably diligent search.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 1:

Pursuant to the parties’ September 7, 2022 meet and confer, Bungie will produce non-privileged documents sufficient to show the portions of the object code of the “Destiny 2” work identified in Copyright Registration No. TX 8-933-655 that were copied that are in Bungie’s possession, custody, or control, if any, that are located after a reasonable search.

REQUEST FOR PRODUCTION NO. 2:

A true and correct copy of the source code for the “Destiny 2: Beyond Light” work identified in Copyright Registration No. TX 8-933-658

RESPONSE TO REQUEST FOR PRODUCTION NO. 2:

Subject to and without waiving its General Objections, Bungie will produce non-privileged documents responsive to this Request that are in Bungie’s possession, custody, or control, if any, that are located after a reasonably diligent search.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 2:

Pursuant to the parties’ September 7, 2022 meet and confer, Bungie will produce non-privileged documents sufficient to show the portions of the object code of the “Destiny 2: Beyond Light” work identified in Copyright Registration No. TX 8-933-658 that were copied that are in Bungie’s possession, custody, or control, if any, that are located after a reasonable search.

1 **SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 21:**

2 Pursuant to the parties' September 7, 2022 meet and confer, Bungie will produce non-
3 privileged documents responsive to this request that are in Bungie's possession, custody, or
4 control, if any, that are located after a reasonable search.

5
6
7 Dated: September 16, 2022

By: /s/ Jacob P. Dini

William C. Rava, Bar No. 29948
Christian W. Marcelo, Bar No. 51193
Jacob P. Dini, Bar No. 54115
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that they served a copy of the foregoing Bungie, Inc.'s Supplemental Objections and Responses to Defendant Phoenix Digital Group LLC's First Set of Requests for Production to the following on September 16, 2022, via email at the address below:

Philip P. Mann, WSBA No. 28860
Mann Law Group PLLC
403 Madison Ave. N.
Suite 240
Bainbridge Island, WA 98110
Email: phil@mannlawgroup.com

Dated: September 16, 2022

/s/ Jacob P. Dini
Jacob P. Dini

CERTIFICATE OF SERVICE
(No. 2:21-cv-811-TSZ)

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